

From: [Bill Jacobs](#)  
To: [Jim Barron](#)  
Subject: RE: bait station and efficacy protocol questions  
Date: 05/18/2009 11:32 AM

---

OK.

You should have them some time tomorrow.

▼ RE: bait station and efficacy protocol questions

RE: bait station and efficacy protocol questions

Jim Barron to: Bill Jacobs

05/18/2009  
09:59 AM

Bill,

Thanks a lot. Please go ahead and send both when you get back to the office.

Best Regards,

Jim

Jim Barron, Ph. D.  
Managing Regulatory Consultant  
Exponent®, Inc.  
1150 Connecticut Ave. NW  
Suite 1100  
Washington, DC 20036

Telephone (202) 701-7325  
Alternate Telephone (919) 462-9860  
Facsimile (202) 772-4979  
Email Address [jbarron@exponent.com](mailto:jbarron@exponent.com)

-----Original Message-----

From: [Jacobs.Bill@epamail.epa.gov](mailto:Jacobs.Bill@epamail.epa.gov) [mailto:[Jacobs.Bill@epamail.epa.gov](mailto:Jacobs.Bill@epamail.epa.gov)]  
Sent: Sunday, May 17, 2009 8:52 PM  
To: Jim Barron  
Subject: RE: bait station and efficacy protocol questions

I'm off-site at the moment and will not be in the office until Tuesday. Consequently, I don't have easy access to .pdf versions of the protocols. By the way, 1.203 is the method for screening anticoagulant baits for efficacy vs. Norway rats and roof rats. The "rat" method for acute baits is numbered "1.209". I can send you either or both according to your client's preference.

RE: bait station and efficacy protocol  
questions

Jim  
Barron

to:  
Jacobs Bill

05/15/2009 02:12

PM

Bill,

Thanks for the mouse protocol and your comments. As John Hebert already provided the rat protocol, we now have the ones for both the mouse and the rat. But we find upon reviewing these protocols that we also need to see the two method protocols that are mentioned within each protocol. These protocols are:

1. OPP 1.203 Standard Norway rat acute dry bait laboratory test method.
2. OPP 1.210 Standard house mouse acute dry bait laboratory test method.

With this information, I think most of our questions about how to set up the study we need will be answered.

Thank you,

Jim

Jim Barron, Ph. D.  
Managing Regulatory Consultant  
Exponent®, Inc.  
1150 Connecticut Ave. NW  
Suite 1100  
Washington, DC 20036

Telephone (202) 701-7325  
Alternate Telephone (919) 462-9860  
Facsimile (202) 772-4979  
Email Address [jbarron@exponent.com](mailto:jbarron@exponent.com)

-----Original Message-----

From: [Jacobs.Bill@epamail.epa.gov](mailto:Jacobs.Bill@epamail.epa.gov) [mailto:[Jacobs.Bill@epamail.epa.gov](mailto:Jacobs.Bill@epamail.epa.gov)]  
Sent: Wednesday, May 13, 2009 1:04 PM  
To: Jim Barron  
Cc: [Hebert.John@epamail.epa.gov](mailto:Hebert.John@epamail.epa.gov)  
Subject: RE: bait station and efficacy protocol questions

You can contact John or I. Either way, we'll set up a meeting and invite the OPP folks who we think should be there, based mainly upon the content of your request.

The mouse placepack protocol for acute rodenticides is attached below.

(See attached file: 1-220MacPP.pdf)

That protocol can be adapted to test the wrapped bait block in the bait station. Such a test essentially would answer the question of whether mice readily would penetrate the new wrapper and also, if wild-type house mice were used as subjects, could indicate whether the bait station's structure or composition is inhibitory to mice in any way. The primary modifications needed to adapt Protocol 1.220 for testing ready-to-use bait stations with house mice involve greatly expanding the size of the testing arena (so that 2 stations can be deployed with label-consistent spacing) and increasing the amount of alternative cover provided (so that mice are not primarily attracted to the stations for the cover that they provide).

Your client might be in contact with Chuck Dickerson. He was involved with development and testing of many of the PM Resources rodenticide products when they were registered to Purina Mills. He retired and moved to Michigan a while back, but he might be useful to them in helping to develop protocols specific to testing this product.

|----->  
| From: |  
|----->

>-----  
-----|

|"Jim Barron" <[jbarron@exponent.com](mailto:jbarron@exponent.com)>

```

|
>-----|
-----|
|----->
| To:      |
|----->
>-----|
-----|
|Bill Jacobs/DC/USEPA/US@EPA
|
>-----|
-----|
|----->
| Date:    |
|----->
>-----|
-----|
|05/13/2009 10:56 AM
|
>-----|
-----|
|----->
| Subject:  |
|----->
>-----|
-----|
|RE: bait station and efficacy protocol questions
|
>-----|
-----|

```

Bill,

Ok, it sounds like I need to put together a formal meeting request. Meanwhile, for you information, the client is Virbac Animal Health (dba) PM Resources. The existing bait block they are going to come in for a new product in a bait station with for home use is currently registered as 67517-66. They are planning to shrink-wrap the bait block and refills with something different from the place pack paper they currently have registered with their pellets, so there are palatability and efficacy questions to address. We need to see the old mouse place pack efficacy protocol and discuss with you whether or not we can bridge to that, as well as a number of other more general questions. John found for us the old rat protocol for the place pack efficacy study, but the mouse one we still need. If we could see that mouse protocol, it will probably generate questions for our meeting as well.

Should this meeting request be addressed to you or John? I would think we could do this meeting with you, John, and it might be helpful to have Rusty in there, in case there are any questions about the amended labels.

Thanks,

Jim

Jim Barron, Ph. D.  
 Managing Regulatory Consultant  
 Exponent®, Inc.  
 1150 Connecticut Ave. NW  
 Suite 1100  
 Washington, DC 20036

Telephone (202) 701-7325  
 Alternate Telephone (919) 462-9860  
 Facsimile (202) 772-4979  
 Email Address [jbarron@exponent.com](mailto:jbarron@exponent.com)

-----Original Message-----

From: [Jacobs.Bill@epamail.epa.gov](mailto:Jacobs.Bill@epamail.epa.gov) [mailto:[Jacobs.Bill@epamail.epa.gov](mailto:Jacobs.Bill@epamail.epa.gov)]